1 2 3 4 5 6 7 8 9 10 11	Joseph A. Gutierrez (Bar No. 9046) jag@mgalaw.com Stephen G. Clough (Bar No. 10549) sgc@mgalaw.com MAIER GUTIERREZ & ASSOCIATES 8816 Spanish Ridge Avenue Las Vegas, Nevada 89148 Telephone: (702) 629-7900 Attorneys for Plaintiff ROSEANNE BUSEY Anna Maria Martin (Bar No. 7079) amartin@mmhllp.com MESERVE, MUMPER & HUGHES LLP 316 California Ave. # 216 Reno, Nevada 89509  800 Wilshire Boulevard, Suite 500 Los Angeles, California 90017-2611 Telephone: (213) 620-0300  Attorneys for Defendant		
12	Attorneys for Defendant UNUM LIFE INSURANCE COMPANY OF AMERICA		
13 14	UNITED STATES DISTRICT COURT		
	DISTRICT OF NEVADA - LAS VEGAS		
15	ROSEANNE BUSEY, an individual,	Case No. 2:18-cv-01612-JAD-GWF	
16 17	Plaintiff,	) ) STIPULATION AND [PROPOSED] ) ORDER FOR EXTENSION OF TIME	
18	vs.	FOR DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO THE	
19	UNUM LIFE INSURANCE COMPANY OF AMERICA, a foreign corporation; DOES X	COMPLAINT (FIRST REQUEST)	
20	through XX; and ROE CORPORATIONS I through X, inclusive,	Complaint Served: August 31, 2018 Response Due: September 21, 2018 Prop. Resp. Date: October 12, 2018	
21	Defendant.	) Frop. Resp. Date. October 12, 2018 ) Judge: Jennifer A. Dorsey	
22		) Complaint Filed: August 27, 2018	
23	WHEREAS, Defendant UNUM LIFE		
24	("UNUM") was served with the Complaint in this action by Plaintiff Roseanne Busey ("Plaintiff")		
25	on August 31, 2018, which was filed in the United States District Court, District of Nevada;		
26	WHEREAS, the deadline for UNUM to respond to the Complaint is presently September 21, 2018;		
27	WHEREAS, UNUM's counsel requires time to review and assess the file in order to prepare		
28	an adequate response to the Complaint;		
	Case No. 2:18-cv-01612-JAD-GWF	l	

1	WHEREAS, for good cause and pursuant to Local Rule IA 6-1, the parties wish to extend the		
2	time within which a responsive pleading to the Complaint must be filed and served by UNUM by		
3	twenty-one (21) days, to October 12, 2018;		
4	WHEREAS, this is the first stipulation for extension of time to file a responsive pleading to		
5	the Complaint;		
6	IT IS HEREBY STIPULATED by and between Plaintiff and UNUM, by and through their		
7	respective attorneys of record, that the time within which a responsive pleading to Plaintiff's		
8	Complaint must be filed and served by UNUM is extended to October 12, 2018.		
9	IT IS SO STIPULATED.		
10		Joseph A. Gutierrez	
		Stephen G. Clough MAIER GUTIERREZ & ASSOCIATES	
11			
12		By: <u>/s/ Stephen G. Clough</u> Joseph A. Gutierrez, Esq	
13		Stephen G. Clough, Esq.	
14		8816 Spanish Ridge Avenue	
		Las Vegas, NV 89148 Attorneys for Plaintiff ROSEANNE BUSEY	
15		Attorneys for Frankii Robbi 1111 Dobbi	
16	1 /	Anna Maria Martin	
17		MESERVE, MUMPER & HUGHES LLP	
18		By: /s/ Anna Maria Martin	
		Anna Maria Martin 316 California Ave. # 216	
19		Reno, Nevada 89509	
20		Attorneys for Defendant UNUM LIFE	
21		INSURANCE COMPANY OF AMERICA	
22	<u>AFFIRMATION</u>		
23	The undersigned does hereby affirm that the preceding document does not contain the social		
24	security numbers of any person.		
25	IT IS SO ORDERED:		
26	DATED: September 20, 2018		
27	Leonge Foley Jr.		
28	GEORGE FOLEY, JR.		
20	UNITED STATES MAGISTRATE JUDGI	≣	
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LAW OFFICES
MESERVE,
MUMPER &
HUGHES LLP